

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL No. 16-2738 (MAS) (RLS)**

Motion Day: July 1, 2024

***THIS DOCUMENT RELATES TO ALL CASES***

**THE PLAINTIFFS' STEERING COMMITTEE'S MOTION TO QUASH  
OR FOR PROTECTIVE ORDER REGARDING SUBPOENAS DIRECTED  
AT BEASLEY ALLEN LAW FIRM,  
SMITH LAW FIRM, AND ELLINGTON MANAGEMENT GROUP**

**PLEASE TAKE NOTICE** that, at 9:00 a.m. on July 1, 2024, or at such other time as set by the Court, Plaintiffs, by and through the Plaintiffs' Steering Committee (PSC), will Move to Quash or for Protective Order Regarding Subpoenas Directed at Beasley Allen Law Firm, Smith Law Firm, and Ellington Management Group.

As fully discussed in Plaintiff's Memorandum of Law in Support of this Motion, the Court should quash, or in the alternative issue a protective order, regarding Johnson & Johnson's and LLT Management LLC's subpoenas directed at Beasley Allen Law Firm (ECF No. 32201), Smith Law Firm (ECF No. 32226), and Ellington Management Group (ECF No. 322215) because the discovery sought is privileged, irrelevant, disproportionate to the needs of this case, and unduly burdensome, oppressive, and harassing.

Plaintiffs respectfully request that the Court grant the Motion to Quash or For Protective Order Regarding Subpoenas Directed at Beasley Allen Law Firm, Smith Law Firm, and Ellington Management Group. A proposed order is attached for the Court's consideration.

Dated: May 30, 2024

Respectfully submitted,

/s/ Christopher M. Placitella

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### **CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ Michelle A. Parfitt  
Michelle A. Parfitt